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February 21, 2020

VIA, ELECTRONIC FILING

Jo Anne Wessinger Hill, Esquire,
Hearing Officer,
The Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

- Re: • Ganymede Solar, LLC v. Dominion Energy South Carolina, Incorporated –
 Docket 2019-390-E
 • **Response to Utility’s Request for Extension**

Ms. Hill:

The undersigned is counsel of record for Ganymede Solar, LLC, (“Ganymede”). I am writing to you in response to Dominion Energy South Carolina, Incorporated’s (“Utility”) correspondence to you, e-filed with the Commission on today’s date.

The Utility’s correspondence requested an extension of their current Testimony filing date of February 24, 2020, until March 6, 2020. Accordingly, I request an extension of Ganymede’s responsive filing date from February 26, 2020, until seven days after Utility’s new Testimony filing date of March 6, 2020, or until March 13, 2020, (a seven day responsive period for Ganymede was granted by the Commission, in its prefilng letter issued in this Docket).

The Utility in its correspondence to you today, includes multiple statements casting Ganymede’s procedural posture in a negative light. Factually, Ganymede has a Motion for Protective Order pending before this Commission and additionally Ganymede filed timely Objections/Responses to the Utility’s Discovery Requests, before the due date for a response. Therefore, it is not true that Ganymede has simply refused to participate in the discovery process. Ganymede has availed itself of a Motion for Protective Order, as has the Utility’s predecessor in the past.

If you have any questions, please do not hesitate to contact me, and this correspondence is,

Respectfully Submitted,

/s/Richard L. Whitt
Richard L. Whitt,
As Counsel for Ganymede Solar, LLC

RLW/cas

cc: All parties of record in Docket 2019-390-E, *via electronic mail*